

Kim Robert Scovill, Esq.  
Vice President – Legal, Regulatory, and Industry Relations, Safety & Security Technologies  
Comtech Telecommunications Corp.

Phone: 302-932-9697 Fax: 410-280-4903 kim.scovill@comtechtel.com

October 31, 2016

VIA ELECTRONIC SUBMISSION

*EX PARTE* COMMUNICATION

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket No. **15-80**; New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. **04-35**; and The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, PS Docket No. **11-82**

Dear Ms. Dortch:

On Thursday, October 27, 2016, the undersigned, Kent Hellebust – Vice President & General Manager, Mark Longstaff – Vice President Service Delivery (in person), and Agastya Kohli - Senior Director Operations Engineer (via telephone), all from Comtech Telecommunications Corp. ("Comtech"), met with the members of the Federal Communication Commission's ("Commission") Public Safety and Homeland Security Bureau ("PSHSB") listed below. Comtech appreciates the opportunity to meet with the PSHSB.

Our discussions centered on the topics detailed in the PowerPoint slides attached to this filing. The slides review issues related to 911 reliability and the challenges associated with an evolving 911 ecosystem. Comtech also addresses three sub- topics: 1) the role of hosted 911 service providers in this new telecom ecosystem; 2) IP-based 911 and the vulnerabilities of the public internet; and 3) distributed denial of service (DDoS) attacks. To address these concerns, Comtech recommends, among other suggestions, that the Commission encourage: 1) public safety migration to the i3network design; 2) delivery of emergency traffic via private circuits to achieve the desired end state of the most reliable and secure 911 national system; and 3) public safety agencies to incorporate diverse geo- and vendor redundant private circuits for last mile connectivity for emergency traffic.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to all FCC employees mentioned herein.

Please direct any questions as to this matter to the undersigned. Thank you.

Sincerely,

/s/

Kim Robert Scovill, Esq.  
Vice President – Legal, Regulatory, and External Affairs

Cc:



John Healy, Chief Statistician (PSHSB)  
Julia Tu, Engineer (PSHSB)  
Michael Caiafa, Telecom (PSHSB)  
Jay Bennett, Engineer (PSHSB)  
Jerome Stanshine, Engineer (PSHSB)  
Jeffery Goldthorp, Deputy Bureau Chief (PSHSB)  
David Furth, Deputy Bureau Chief (PSHSB)  
Suzon Cameron, (PSHSB)  
Lisa Hartigan, (PSHSB)  
Timothy May, Policy and Licensing, (PSHSB)